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September 15, 2021

**BY ECF AND ELECTRONIC MAIL**

Hon. Ann Marie Donio, U.S.M.J.  
United States District Court for the District of New Jersey  
Mitchell H. Cohen U.S. Courthouse, Room 2010  
1 John F. Gerry Plaza, 4<sup>th</sup> & Cooper Streets  
Camden, New Jersey 08101

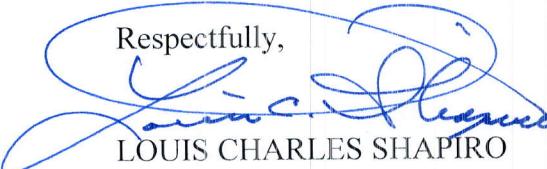
Re: Audra Capps, et al. v. Joseph Dixon, et al.  
Case No.: 1:19-cv-12002-RMB-AMD

Tanika Joyce, et al v. Joseph Dixon, et al.  
Case No.: 1:20-cv-01118- RMB-AMD

Dear Judge Donio:

I represent Plaintiffs in the above-captioned cases. In accordance with the Court's most recent scheduling order, I am submitting Plaintiffs' reply to the Defendants' September 8, 2021 response to my July 28, 2021 discovery deficiency letter. Please note that, while this letter itself is being submitted on the public docket, my reply letter of today's date addressed to counsel is being sent to Your Honor by electronic mail only at this time due to references to certain confidential subject areas. If I am directed to file the full response with redactions, I will of course follow the Court's instructions. I thank the Court for its time and attention to this case.

Respectfully,

  
LOUIS CHARLES SHAPIRO

Enclosure

cc: Counsel of Record (By ECF; w/attachment by email)